

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Three)

Docket No. RM2016-11

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(September 6, 2016)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed change to analytical methods relating to the design and operation of the In-Office Cost System (IOCS) and labeled as Proposal Three.¹ The proposed questions seek information that will allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal Three meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

Proposed Questions

1. On pages 2, 7 and 11 of the Petition, the Postal Service refers to Proposal Nine (Docket No. RM2015-2).

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Three), August 22, 2016 (Petition).

- a. Please confirm that Proposal Three does not depend on the Commission's prior approval of Proposal Nine.
 - b. If not confirmed, please explain how Proposal Three is related to Proposal Nine.
2. Please refer to the Library Reference USPS-RM2016-11/1, folder "IOCSClusterFolder_Public," worksheet "ImpactTablesForIOCSCluster_Public." For all hardcoded numbers in tables 1 through 4 (in tabs 1-4), please provide direct links/references to the input data files.
3. Please refer to Library Reference USPS-RM2016-11/1, folder "IOCSClusterFolder_Public," worksheet "ImpactTablesForIOCSCluster_Public," tab "Table4 ImpactProducts." The Petition states that "[t]able 4 ... compares the costs for cost segments 6 and 7 and for total CRA costs, for FY2016, Q2 and Q3" before and after the implementation of IOCS-Cluster system. Petition at 16.
 - a. Please confirm that columns E and F (Table 4) provide attributable costs for FY 2015 (as indicated in the table headings) and not in FY 2016, Quarters 2 and 3 (as stated in the above-referenced quote).
 - i. If confirmed, please provide the revised (as a result of IOCS-Cluster system implementation) and current attributable costs for FY2016, Quarters 2 and 3.
 - ii. If not confirmed, please clarify what data are provided in columns E and F.
 - b. Please indicate if the implementation of IOCS-Cluster system would affect costs in other CRA cost segments besides cost segments 6 and 7. If applicable, please provide the impact of the IOCS-Cluster system implementation on each of these cost segments.

Respectfully submitted,

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